

1 Q. Okay. And you don't know the details of
2 this alleged sexual assault; correct?

3 A. No.

4 Q. You did not ask any details about this
5 alleged sexual assault; correct?

6 A. No.

7 Q. The next sentence says, "One individual was
8 in charge of onboarding new chapters. Turns out they
9 were using their authority to coerce potential chapter
10 leaders into having sex." Do you see that?

11 A. Oh, here it is. Right.

12 Q. You don't know who the individual is that
13 he's talking about; correct?

14 A. No.

15 Q. You don't have any information to expand
16 upon whatever this allegation is of this unknown
17 person using their authority to coerce potential
18 chapters leaders into having sex; correct?

19 MS. TESORIERO: Objection to form.

20 A. You're asking -- excuse me. The question
21 is do I know?

22 Q. Beyond the text of this paragraph, did you
23 perform any fact investigation into what Scott Malphas
24 is saying here?

25 A. I didn't ask him to elaborate, no.

1 outcome thereof;

2 I further certify that the witness before
3 examination was by me duly sworn to testify to the
4 truth, the whole truth, and nothing but the truth;

5 I further certify that the deposition, as
6 transcribed, is a full, true and correct transcript of
7 the testimony, including questions and answers, and
8 all objections, motions, and exceptions of counsel
9 made and taken at the time of foregoing examination
10 and was prepared pursuant to Washington Administrative
11 Code 308-14-135, the transcript preparation format
12 guideline;

13 I further certify that I am sealing the
14 deposition in an envelope with the title of the above
15 cause and the name of the witness visible, and I am
16 delivering the same to the appropriate authority;

17

18 IN WITNESS WHEREOF, I have hereunto set my hand,
19 and affixed my official seal this 22nd day of
20 November 2023.

21

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23

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25

Cheryl Macdonald, CCR
Washington State Certified
Court Reporter
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